

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SUPERB MOTORS INC., TEAM AUTO SALES LLC,  
ROBERT ANTHONY URRUTIA, 189 SUNRISE  
HWY AUTO LLC, NORTSHORE MOTOR  
LEASING, LLC, BRIAN CHABRIER, individually and  
derivatively as a member of NORTSHORE MOTOR  
LEASING, LLC, JOSHUA AARONSON, individually  
and derivatively as a member of 189 SUNRISE HWY  
AUTO, LLC, JORY BARON, 1581 HYLAN BLVD  
AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591  
HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD  
AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519  
HYLAN BLVD AUTO LLC, 76 FISK STREET  
REALTY LLC, 446 ROUTE 23 AUTO LLC and  
ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY  
THOMASSON, DWIGHT BLANKENSHIP, MARC  
MERCKLING, MICHAEL LAURIE, THOMAS  
JONES, CPA, CAR BUYERS NYC INC., GOLD  
COAST CARS OF SYOSSET LLC, GOLD COAST  
CARS OF SUNRISE LLC, GOLD COAST MOTORS  
AUTOMOTIVE GROUP LLC, GOLD COAST  
MOTORS OF LIC LLC, GOLD COAST MOTORS OF  
ROSLYN LLC, GOLD COAST MOTORS OF  
SMITHTOWN LLC, UEA PREMIER MOTORS  
CORP., DLA CAPITAL PARTNERS INC., JONES,  
LITTLE & CO., CPA'S LLP, FLUSHING BANK,  
LIBERTAS FUNDING LLC, and J.P. MORGAN  
CHASE BANK, N.A.,

Defendants.

-----X

Case No.: 2:23-cv-6188 (JMW)

**NOTICE OF CROSS-MOTION**

**PLEASE TAKE NOTICE**, that upon the accompanying declaration of Robert Anthony Urrutia dated May 30, 2025, the letter brief in support, and all the prior papers and proceedings herein, the Plaintiffs Superb Motors Inc (“Superb”), Team Auto Sales LLC (“Team”), and Robert Anthony Urrutia (“Urrutia”) (Superb, Team, and Urrutia collectively hereinafter the “Superb Plaintiffs”) will cross-move this Court, before the Hon. James M. Wicks, U.S.M.J. (“Judge Wicks”), at the United States District Court for the Eastern District of New York, 100 Federal Plaza, Courtroom 1020, Central Islip, NY 11722, for an Order reconsidering that aspect of its May 23, 2025 Order denying the Superb Plaintiffs’ renewed Order to show cause to modify the preliminary injunction to permit them to sell the remaining enjoined vehicles, and for such other and further relief as the Court deems just, equitable, and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to ¶ 3(A) of Judge Wicks’ Individual Practice Rules, this motion may be made without a pre-motion conference.

**PLEASE TAKE FURTHER NOTICE**, pursuant to Local Civil Rule 6.1, Defendants’ opposition papers are due on Friday, June 13, 2025, and Plaintiff’s reply papers in further support are due on Friday, June 20, 2025, unless otherwise ordered by this Court.

Dated: Jamaica, New York  
May 30, 2025

Respectfully submitted,  
**SAGE LEGAL LLC**  
By: /s/ Emanuel Kataev, Esq.  
Emanuel Kataev, Esq.  
18211 Jamaica Avenue  
Jamaica, NY 11423-2327  
(718) 412-2421 (office)  
(917) 807-7819 (cellular)  
(718) 489-4155 (facsimile)  
emanuel@sagelegal.nyc

*Attorneys for Plaintiffs  
Superb Motors Inc.,  
Team Auto Sales LLC, and  
Robert Anthony Urrutia*